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Attorneys for Defendant John Potter, Postmaster General of the United States

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

JUDITH E. CORBETT,

Plaintiff,

v.

JOHN POTTER, Postmaster General of the  
United States,

Defendant.

No. C 04-3671 MEJ

**STIPULATION RE: DISCOVERY  
AND ORDER THEREON**

Plaintiff Judith E. Corbett ("Plaintiff"), and Defendant John Potter, Postmaster General of the  
United States ("Defendant") hereby agree and stipulate as follows:

STIPULATION REGARDING DISCOVERY

1. Although the discovery cutoff is September 9, 2005, the parties stipulate and agree that in order to  
accommodate the schedules of the parties' counsel and the deponents, the deposition of Kirby

STIPULATION RE: DISCOVERY - CASE NO. 04-3671 MEJ

Faciane will proceed on September 19, 2005 at 1:30 at the U.S. Attorneys office on the 10<sup>th</sup> Floor, 450 Golden Gate, San Francisco, CA, and the deposition of Gerald Sanchez will proceed on September 20, 2005 at 1:30 p.m. at 390 Main Street, Suite 740, San Francisco, CA. If necessary, the parties will meet and confer, as required by the court's standing order and the local rules regarding issues about questions asked or objections interposed during those depositions.

2. The parties agree that they have met and conferred without success regarding the need to take the deposition of Al Iniguez, which was noticed for September 7, 2005. Pursuant to the Court's standing order regarding discovery issues, the parties have summarized their disputed in the Letter to the Honorable Magistrate Judge Maria Elena James dated September 15, 2005. The parties stipulate and agree that in the event the Court orders the deposition of Al Iniguez to proceed, it will take place at a mutually convenient time and date prior to October 24, 2005 in San Diego, CA.
3. Plaintiff's counsel has indicated that she may have concerns regarding Defendant's responses to the plaintiff's interrogatories, request for admissions and request for production of documents. Defendant's counsel is not yet aware of those concerns. Plaintiff's counsel intends to bring any issues that cannot be informally resolved after meeting and conferring with Defendant's counsel to the attention of the Court by way of timely filing a joint letter pursuant to the Court's standing order regarding discovery issues, if necessary.
4. The parties will undertake to resolve all pending issues informally, before consuming the resources of the court with time-consuming motions.

LAW OFFICES OF MARY DRYOVAGE

KEVIN V. RYAN  
United States Attorney

/s/\_\_\_\_\_  
Mary Dryovage  
Attorney for Plaintiff

/s/\_\_\_\_\_  
Julie A. Arbuckle  
Assistant United States Attorney  
Attorneys for Defendant  
Dated: September 16, 2005

Dated: September 15, 2005

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: September 20, 2005

MARIA-ELENA  
United States

